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8 UNITED STATES BANKRUPTCY COURT
9 EASTERN DISTRICT OF CALIFORNIA

11 In re

Case No. 10-30328-C-7

12 VICKI JANL PELLETIER

DCN: DKC-1

14 Debtor

Date: August 3, 2010

Time: 9:30 a.m.

Judge: Christopher M. Klein

Dept.: C, Ctrm 35

501 I St., 6th. Floor
Sacramento, CA


17 MOTION TO COMPEL TRUSTEE
18 TO ABANDON BUSINESS

19 VICKI JANL PELLETIER, debtor herein, moves this court for an order compelling the
20 Trustee, Linda Schuette, to abandon the business operated by the debtor, known as Headlines Day
21 Spa, located at 1416 Yuba St., Redding, CA. The business is the debtor's sole source of income
22 and all of the business assets are exempt (**see exhibit A**). The exempted assets of the business are
23 as follows: 3 tanning beds (\$600), 1 standing tanning bed (\$500), 4 styling chairs (\$800), 3 dryers
24 (\$100), 3 dryer chairs (\$100), 1 washing machine (\$100), 1 dryer (\$100), 2 chairs (\$50), 3 storage
25 containers (\$100), 1 fax machine (\$25), 1 bookcase (\$50), 3 display cabinets (\$150), 2 shampoo
26 sinks (\$50), 2 shampoo chairs (\$50), hair color (\$250), permanent products (\$50), retail products

1 (\$700), gift ware (\$500) (see exhibit B). It is of no actual value for the bankruptcy estate, but is
2 burdensome to the trustee and the estate, in that the sole source of income from it is from the
3 debtor's personal efforts and a small varying amount from rental of booths to other beauticians.
4 The Trustee has informed the debtor and his counsel that the business has no value to the estate
5 and is a liability to her and the estate. There is no goodwill or other value in either business that
6 could be sold by anyone, including the debtor and the Trustee.

7 The debtor, Vicki Janle Pelletier. therefore, requests that the Trustee be directed to
8 abandon the business known as, Headlines Day Spa, and for such other relief as may be
9 appropriate.

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11 Dated: 6/29/10

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14 Dennis K. Cowan, attorney for debtor
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